

FLUOR

June 9, 2003

FH-0302319

Ms. Julie M. Atwood, Manager
Waste Treatment/Transportation
Bechtel Hanford, Inc.
3350 George Washington Way, H0-18
Richland, Washington 99352

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AUG 22 2003
EDMC

Dear Ms. Atwood:

DISPOSAL OF 183-H BASIN WASTE AT ERDF EXHIBITING FREE LIQUIDS

183-H Basin waste is planned for treatment and disposal at the Environmental Restoration and Disposal Facility. Some of the samples of the 183-H Basin waste, when tested via the paint filter test method 9095, were found to exhibit free liquids. The samples testing positive for free liquid included waste streams: Basin #3 and Basin #4 solids and sandblast grit. The Basin #4 solids will be treated to comply with Land Disposal Restrictions (LDR) treatment standards of 40 CFR 268 and, in the process, free liquid will be handled to remove the liquids from the waste prior to disposal. The Basin #3 solids and sandblast grit waste streams are not planned for treatment. These waste streams, where free liquid could exist, are evaluated herein for compliance with disposal requirements. The other 183-H Basin waste streams do not exhibit the potential for free liquids and are not the subject of this letter.

As stated in the *Engineering Evaluation/Cost Analysis (EE/CA) for Disposition of Mixed Waste from the 183-H Solar Evaporation Basins*, DOE/RL 2002-63, Applicable or Relevant and Appropriate Requirements (ARARs) include the LDR of WAC 173-303-140 and the *Environmental Restoration and Disposal Facility (ERDF) Waste Acceptance Criteria*, BHI-00139. In regard to disposal of liquids, the ERDF waste acceptance criteria cites no requirements other than those of WAC 173-303-140(4)(b). The requirements of WAC 173-303-140(4)(b)(ii)(A) prohibits placement of containers of waste exhibiting free liquids in a landfill, unless:

- (I) All free standing liquid has been removed by decanting, or other method, or
- (II) Has been mixed with sorbent or stabilized (solidified) so that free-standing liquid is no longer observed.

As long the waste meets the requirement cited above, containerized waste may be placed in a landfill.

The Basin #3 solids waste was packaged in waste drums after the liquid was decanted off and transferred into another basin, as per provision WAC 173-303-140(4)(b)(ii)(A)(I). Also, absorbent was added to the waste during the packaging, as per provision WAC 173-303-140(4)(b)(ii)(A)(II). The absorbents employed were mineral types that comply with the requirements for disposal of

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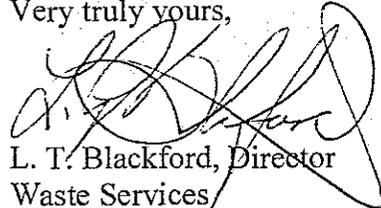
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WAC 173-303-140(4)(b)(iv). Further, examination of 29 drums after packaging confirmed the presence of absorbent and the lack of free-standing liquid. The Basin #3 solids then comply with disposal requirements, WAC 173-303-140(4)(b)(ii)(A), for containerized waste and may be disposed at the ERDF.

The sandblast grit waste was packaged in waste drums with absorbent added. The absorbent was added to the waste during the packaging as per provision WAC 173-303-140(4)(b)(ii)(A)(II). The absorbents employed were mineral types that comply with the requirements for disposal of WAC 173-303-140(4)(b)(iv). Examination of nine drums after packaging confirmed the presence of absorbent and the lack of free-standing liquid. The sandblast grit then comply with disposal requirements, WAC 173-303-140(4)(b)(ii)(A), for containerized waste and may be disposed at the ERDF.

Should you have any questions or comments regarding this correspondence, please contact Mr. J. L. Westcott, of my staff, on 373-9800.

Very truly yours,



L. T. Blackford, Director
Waste Services
Waste Management Project

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